

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5 230 SOUTH DEARBORN ST.

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS-11

JUN 0 5 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RGJ MANUPACTURING (42) STANLEY ORIVE *LYMOUTH, IN 46563

Re: Wayne Reclamation and Recycling ("Site")
Columbia City, Indiana

Dear Sir or Madam:

The United States Environmental Protection Agency (U.S. EPA) has documented the release or threatened release of hazardous substances, pollutants and contaminants at the above referenced Site. A Remedial Investigation/Feasibility Study (RI/FS) of the Site has been completed. This action was undertaken pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. Section 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Public Law 99-499 (CERCIA).

In accordance with the requirements of Section 104(b) of CERCIA, the Remedial Investigation (RI) Report describes findings on the nature and extent of contamination at the Site. The Feasibility Study (FS) Report considered alternatives necessary to address the conditions at the Site. Along with the FS Report, U.S. EPA issued a Proposed Plan for a thirty day public comment period which ended February 21, 1990. On March 30, 1990, the Regional Administrator issued a Record of Decision (ROD) selecting the remedial action which was originally proposed (See Attachment III) for the Site.

Unless the U.S. EPA determines that a potentially responsible party (PPP), will voluntarily undertake the remedial action necessary at the Site, U.S. EPA may, under Section 104 of CERCIA, undertake the remedial action itself and, under Section 107 of CERCIA, seek reimbursement from PRPs of all response costs incurred in connection with the action taken. Such costs may include, but are not limited to, expenditures for investigation, planning, response and enforcement activities.

Moreover, under Section 106 of CERCIA, U.S. EPA may order responsible parties to implement relief actions deemed necessary by U.S. EPA to protect the public health, welfare or environment from an imminent and substantial

endangerment because of an actual or threatened release of a hazardous substance from a facility.

Responsible parties under Section 107 of CERCIA include current owners and operators of the Site, former owners and operators of the Site at the time of disposal of hazardous substances, as well as persons who owned or possessed hazardous substances and arranged for disposal, treatment, or transportation of such hazardous substances, and persons who accepted hazardous substances for transportation for disposal or treatment to a facility selected by such transporter. U.S. EPA has information indicating that you are a PRP with respect to the Wayne Reclamation and Recycling site. The sources of this information are briefly summarized in Paragraph A of Attachment I to this letter. By this letter, U.S. EPA notifies you of your potential liability with regard to this matter and encourages you, as a potentially responsible party, to reimburse U.S. EPA for the costs incurred to date and to voluntarily perform or finance the response activities that U.S. EPA has determined or will determine are required at the Site.

In accordance with CERCIA and other authorities, U.S. EPA has already undertaken certain actions and incurred certain costs in response to conditions at the Site. These response actions are summarized in Paragraph B of Attachment I to this letter. The approximate cost to date of the response actions performed through U.S. EPA funding at the Site is set forth in Paragraph C of Attachment I. The Agency anticipates expending additional funds for response activities at the Site under the authority of CERCIA and other laws. In accordance with Section 107(a) of CERCIA, demand is hereby made for payment of the amount specified in Paragraph C of Attachment I plus any and all interest authorized to be recovered under Section 107(a) or under any other provision of law. Demand is also hereby made under these authorities for payment of interest on all future costs that U.S. EPA may incur in regard to the Site.

U.S. EPA is currently planning to conduct the following additional response activities at the Site:

- Design and implementation of the remedial action selected and approved by U.S. EPA for the Site; and
- Provision of any monitoring, operation and maintenance necessary at the Site after the remedial action is completed.

In addition, U.S. EPA may, pursuant to its authorities under CERCLA and other laws, decide that other clean-up activities are necessary to protect public health, welfare and the environment.

If you are already involved in discussions with state or local authorities, engaged in voluntary clean-up action or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise you or direct you to restrict or discontinue any such activities; however, you are advised to inform U.S.

EPA of the status of those discussions or actions in a response to this letter and to provide a copy of this response to any other parties involved in those discussions or actions. Your response letter should be sent to:

Tinka G. Hyde, 5HS-11 U.S. Environmental Protection Agency 230 South Dearborn Street Chicago, Illinois 60604

Pursuant to Section 122(e)(1) of CERCIA, the U.S. EPA has determined that a period of negotiation may facilitate an agreement with you and other PRPs. Upon initiation of the negotiations moratorium period, you will have a maximum of 60 days to coordinate with any PRPs and to present to U.S. EPA a "good faith" proposal for implementing and conducting the remedial action recommended in the Proposed Plan. To assist the PRPs in negotiating with U.S. EPA concerning this matter, U.S. EPA is providing a list of all other PRPs to whom this notification is being sent and the names and addresses of the RI/FS PRP Steering Committee. This list is appended as Attachment II to this letter. It should be noted that inclusion on or exclusion from the list does not constitute a final determination by the Agency concerning the liability of any party for remediation of Site conditions or payment of past costs. Information regarding a ranking by volume and nature of substances contributed by each PRP, as contemplated by Section 122(e)(4)(A), has previously been provided to the steering committee.

In accordance with the requirements of Section 122(e)(2), during the 60 day calendar period, beginning June 28, 1990, the U.S. EPA will not commence remedial action at the Site. U.S. EPA may, however, commence any additional studies or investigations authorized under Section 104(b), including remedial design, during this negotiation period. If U.S. EPA receives from the PRPs within the 60 day calendar period a written "good faith offer" which demonstrates the PRP's qualifications and willingness to conduct and/or finance the remedial design and remedial action (RD/RA) consistent with U.S. EPA's Proposed Plan, U.S. EPA will extend its moratorium on commencement of the remedial action work an additional 60 calendar days. The Proposed Plan, which recommended the remedy that was chosen by the Regional Administrator in the ROD, is appended as Attachment III.

The purpose of the add tional time is to allow the PRPs and the U.S. EPA a period of time to finalize the settlement. A "good faith offer" for RD/RA should include the following:

- a statement of the PRPs' willingness to conduct and/or finance the RD/RA which is generally consistent with U.S. EPA's Proposed Plan or which provides a sufficient basis for further negotiations in light of U.S. EPA's Proposed Plan;
- a detailed "statement of work" or "workplan" identifying how PRPs plan to proceed with the work;

- a demonstration of the PRPs' technical capability to undertake the RD/RA. This should include a requirement that PRPs identify the firm they expect will conduct the work or that PRPs identify the process they will undertake to select a firm.;
- o a demonstration of the PRPs' capability to finance the RD/RA;
- a statement of the PRPs' willingness to reimburse U.S. EPA for past response and oversight costs; and
- the name, address, and phone number of the party or steering committee who will represent the PRPs in negotiations.

Except in extraordinary curcumstances explained in a written request, no extension to this 60 day period will be granted by the U.S. EPA. If a "good faith" proposal is not received within 60 calendar days, the U.S. EPA, pursuant to section 122(e)(4), may proceed to undertake such further action as is authorized by law, including implementation of the remedial action utilizing public funds available to the Agency.

To further facilitate your and any other PRPs' ability to present a "good faith" proposal within the 60 day time limit, the Agency has set up a meeting to provide information that will assist the PRPs in that effort. Toward that end, a draft Consent Decree and Statement of Work (SOW) will be provided to those persons attending this meeting. The details for the meeting are as follows:

Thursday, June 28, 1990 10:30 a.m. Fort Wayne, Indiana Holiday Inn, Grand Ballroom 300 E. Washington Blvd. (219) 422-5511

Additionally, the draft Consent Decree was provided to the State of Indiana. These revisions will be forwarded to the PRPs as they become available. Please note that the draft consent decree and scope of work, though already partly tailored for the purpose of exploring settlement possibilities with you at this particular site, are subject to changes based on the current, ongoing review of these documents by the Department of Justice.

An Administrative Record containing documents that from the basis for the Agency's decision on the selection of the remedy is available for public inspection at U.S. EPA - Region V office in Chicago, Illinois or at the information repositories located at the Columbia City Hall and Peabody Library in Columbia City, Indiana.

If you need further information regarding this letter, you may contact

Tinka Hyde of the Remedial and Enforcement Response Branch at (312) 886-9296. If you have an attorney handling your legal matters, please direct his or her questions to Elizabeth Doyle of the Office of Regional Counsel, U.S. EPA, Region V, at (312) 886-7951.

By a copy of this letter, the U.S. EPA is notifying the State of Indiana and the Natural Resources Trustees, in accordance with Section 122(j) of CERCIA. of its intent to enter into negotiations concerning the implementation of remedial action at the Site, and is also encouraging them to consider participation in such negotiations.

If you have not already done so, the U.S. EPA strongly encourages you to take immediate steps to organize into a Committee to negotiate an agreement with U.S. EPA to undertake the remedial actions at the Site. We hope that you will give this matter your immediate attention.

Sincerely yours,

John Kelley, Acting Chief

Remedial and Enforcement Response Branch

Enclosures

cc: Sheila Huff, DON Doug Fisher, IDHM Tom Mariani, DOF Fatrick Ralsdon, 10NR Environmental Defense Section, DOJ Indiana Attorney Genemal Ian Sparks, USFW

ATTACHMENT I

- A. U.S. EFA has evaluated a body of evidence in connection with its investigation of the Site, specifically, State of Indiana, SPC-17 Liquid Waste Removal Record Hauler Reports pertaining to the Site. Based on this evidence, U.S. EFA has information indicating that you are a potentially responsible party with respect to this Site.
- B. The current PRP Group has conducted the following studies and/or activities at the Site.
 - 1 1986 Removal Action removed and disposed of contaminated soil, disposal of contents of 215-55 gallon drums and backfill of excavated areas.
 - Remedial Investigation to determine the nature and extent of contamination at the Site.
 - 1988 Removal Action conducted by a group of 5 PRPs, removed and disposed of additional contaminated soil and drums, disposal of 23 horizontal tank contents, and fencing.
 - Feasibility Study to evaluate the feasibility of possible alternatives to remediate the Site contamination identified during the Remedial Investigation
 - 5. U.S. EPA released it's Proposed Plan for the site remediation on January 22, 1990.
 - U.S. EPA issued it's Record of Decision for the WRR site remediation on March 30, 1990.
- C. Past Costs: As of October 17, 1989, \$622,066.58 have been expended by U.S. EPA at this Site. The PRPs have been billed for oversight costs and to date have paid \$56,588.02 towards their bills. Therefore, past costs incurred by the U.S. EPA as of October 17, 1989 are \$565,478.56. Following that date, U.S. EPA has incurred, and will incur, additional response costs regarding the WRR sate.

ATTACHMENT II

The names and addresses of all parties receiving a copy of this letter are attached.

CURRENT WRR PRP GROUP STEERING COMMITTEE

Will am N. Hall Breed, Abbott & Morgan 1875 Eye Street, N.W. Washington, D.C. 20006 (202)466-1118

Christopher J. Dunsky Honigman Miller Schwartz and Cohn 2290 First National Building Detroit, Michigan 48226 (313: 256-7872

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9 900116 ERIE STONE 500 ERIE STONE ROAD HUNTINGTON,IN_46750	10 900116 BRIDE CORP. 303 WATER STREET LOGAUSPORT, IW_46947						
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60 900116 ALECTRICO, INC. 55800 CORRANT ROAD P.O. BOX 690 MISHAWAKA, IN_46544

63 900116 ANOCO OIL COMPANT 200 B. RANDOLPH DRIFE CHICAGO,IL_60601

56 900116
MARTHA RUNNELLS MOYER
SR. ATTORNEY, AND PIPELINE CO.
500 REMAISSANCE CENTER
C/O ONE WOODARD AVE.
DETROIT, HI_48263

69 900116 ASHLET WARD, INC. 56083 BLKMART COURT ELKHART, IN 46516

72 900116

BASTIAN PLATING CO., INC.
625 W. 15TH STREET
AUBURN, IN_46706-2133

49 900116 TRUNBALL 6 SONS P.O. BOX 87 LARWILL, IN_46764

52 900116 UNITED TOOL P.O. BOX 1352 ELEMART, IN_46575

55 900116 MEIL-HCLAIM DIVISION OF MARLEY CO. BLAIME STREET MICHIGAN CITY, IN_46360

50 900116
ACTIVE PRODUCTS CORP.
HERBERT A. SPITZER, JR.
ATTORNET AT LAW
P.O. BOX 927
HARION, IN_46652

61 900116
GARY CROUTE
ALUMINUM COMPANY OF AMERIC^A
1501 ALCOA BUILDING
PITTSBURGH,PA_15219

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ANACOMDA POWER CARLE CORPARY
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CHEMICAL LEMMAN TANKLINES
5606 SOUTH U.S. HIGHWAY 421
WESTYILLE, IN_46391

87 900116
CITY ENGINEER'S OFFICE
WATER POLLUTION CONTROL
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DOWALD S. WORLPRL
COLWELL/GENERAL, INCP.O. BOX 329
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COOPER TIRE AND RUBBER COMPANY
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39 900116 CUSTARD INSURANCE ADJUSTERS, INC. P.O. BOX 10479 76 PRODUCTS
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ELKHART, IN 46517

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CHARLES R. CAMPBELL
PLANT ENGINEER, BRODERICK CO.
500 LINCOLN STREET
DIVISION OF HARSCO CORPORATION
HUNCLE, IN 47302

900116
CARTER LUMBER COMPANY
5625 PENDELTON
ANDRESON, IN_46011

85 900116 CHEHSOLV, INC. 604 S. SCOTT P.O. #0# 1433 SOUTH BEND, IN_46624-1433

68 900116
CHI WARASH CAST, IWC.
P.O. 804 668
WARASH, IW_46992

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COLUMELI/GENERAL, INC.
J. RICHAEL O'HARA, E50.
P.O. HOF 2263
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CHARLES V. CHAFFEE, PRESIDENT
BLUFFTON RUBBER CO., INC.
P.O. BOX 255
BLUFFTON, IN 46/14

77 900116 LINDA J. SZEMBHUCH BORG-WARNER CORPORATION 200 SOUTH MICHIGAN AVENUE CHICAGO,IL_60604

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DAYCO CORPORATION
1200 W. HICHIGAN AVENUE
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DEKALB MOLDED PLASTICS
U.S. NIGHWAY 6 WEST
BUTLER, IM_46721

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DOUGLASS CONSTRUCTION CO., INC.
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F.O. BOX 2263
ELECTRIC MOTORS & SPECIALTIES THE
FORT WAYNE, IN_46801

123 900116 ELMHURST BUS GARAGE FORT WAYNE SCHOOL DISTRICT 6006 ARDHORE AVENUE FORT WAYNE, IN 46809 P.O. BOX 1388
DALTON POUNDRIES, INC.
WARSAW, IN_46580

103 907116
LARRY L. TUCKER
DATTON-WALTHER CORPORATION
600 BAST HIGHLAND AVENUE
HUNCIE DIVISION
HUNCIE, IN_47303

106 900116 STRURU L. ARTUSI, ESQ. CORPORATE COUNSEL DE PUY P.O. BOX 966 WARSAW, IN_46580

109 900116
DOTCO COPPER AIR TOOLS
4030 STATE ROUTE 18
#ICESFILLE, OH_43526

112 900116 DUTER INSTRUMENT 55 WARD WAKARUSA, IN_46360

115 900116
ROBERT E. DRYDEN
ASSOCIATE COUNSEL, E-SYSTEMS THE.
P.O. BOX 660248
PALLAS, TX_75266

110 900116
BDOW MACHING DIVISION
SIMPSON INDUSTRIES, INC.
W. INDIANA
BDOW, ON_83516

121 900116 BLRMART PRODUCTS TORP. 700 RAINBOW ROAD TEMBTA, TM_76780

124 (3011) PPCO PRODUCTS P.O. BOX 387 MEM HAVEN, IN 46774 905 NORTH WEST BOULEVARD BLKHART, IN_46514

101 900116 CLEMENT A. REVETTI LEGAL COUNSEL P.O. BOX 1000 DANA CORPORATION TOLEDO, OH 43697

134 900116 DEKALB CENTRAL SCHOOL DISTRICT P.D. BOX 503 AUBURN, IN_46705

137 300117 MM. A. DIDIER \$ 50NS 613 HIGH STREET P.O. BOX 10748 FORT WAYNE, IN_46853-3748

110 900116
MR. MORBERT P. STROBEL
MANUPACTURING ENGINEERING MANAGER
141 RAILROAD STREET
DOUGLAS COMPONENTS CORPORATION
BROWSON, HI_49228

113 900116 DYNAMIC POWER CORPURATION RURAL ROUTE 2 P.O. BOE 148 OSSIAN, IN 46777

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PLEX STEEL INDUSTRIES, INC.
P.O. BOX 129
MEN PARIS, IN_46553

132 900116
RDY S. NOWAKOWSKI
FRANKLIN ELECTRIC CORPANY, INC.
400 EAST SPRING STREET
BLUFFTON, IN_86714

135 900116 G.C.G. BUTERPRISES 2204 LIBERTY DRIVE MISHAWARA, IN_46544

136 900116
THOMAS H. ARMSTRONG
COUNSEL-ENVIRONMENTAL ISSUES
GENERAL BLECTRIC COMPANY
FAIRPIELD, CT_06431

141 900116
DAVID C. LEE
STATE GENERAL COUNSEL & SEE
P.O. BOX 407
SENERAL TELEPHONE COMPANY
VESTPIELD, TW_46704

144 900116
JOHN ROSS
VICE PRESIDENT - E.P.A.
111 EAST BROAD STREET
GRIPCO PASTENERS DIVISION OF HITE
SOUTH WHITELY, IN 46787

147 900116
HENDRICKSON TANDER CORP
SOLER INVESTMENTS, INC.
P.O. BOX 927
KENDALLVILLE, IN_46755

150 900116
HOOK IND. SALES
2731 BROOKLYN AVENUE
PORT WAYNE, IN_46804

LAUREN H. HORISTAY CORPORATE COUNSEL 2655 COOLIDGE ET-CELL-O CORP. TROT, HI_46064

130 900116
FORT WAYNE AIR SERVICE
(RA) JOHN DILLET
4021 AIR ST. BAERPIELD
FORT WAYNE, IN_46809

133 900116

PREBNORT MPG.

DIVISION OF SIMPSON IND. INC.

5. TILLOTSON

PREBNORT, IN_46737

136 900116
GASOLINE EQUIPMENT SRV. CO., INC.
P.O. BOI 10474
FORT WAYNE, IN_46652

139 900116
D. W. HOHRHAM
HAWAGER-ENVIRONHENTAL PROGRAMS
P.O. BOX 2230
GENERAL ELECTRIC COMPANY
FORY WAYNE, IN 46801

142 900116
GENEVA SCREW MACHINE PRODUCTS INC 0.5. 27 M.
P.O. BOY 241
ROUTE 1
GENEVA, TW_46740

145 900116
MAGERMAN CONSTRUCTION CORP.
501 W. WASHINGTON BOOLEVARD
FORT WAYNE, IN 46802

148 900116 MILLSDALP TOOL 6 NCC 135 E. SOUTH MILLSDALE, MI_49242

151 900116 NOOVER DRAINAGE GRINN ROAD HUNTINGTON, IN_96/50 ESSEX INTERNATIONAL, INT.
HOLDAROGRACION
UNITED TECHNOLOGY SUILLOIN.
HARTFORD, CT_06101

128 900116 FLAFLOW, INC. 1610 CERCLE SOUTH BEND, IN_46628

131 900116 PORT WATHE WATER POLLUTION CONTROL PLANT 2601 DWENGER AVENUE PORT WATHE, IN_46803

- 134 900116
G-G SERVICE CO.
GLENDROOK SQUARE SHOPPING CENTER
FORT WAYNE, IN_

137 900116
GATES CHEVROLET CORP.
401 5. LAPAYETTE
SOUTH BEND, IN_46601

140 900116 SEMBRAL PETROLEUM, (4 . 1919 MOBILE FORT HITMPLY HERON

143 900116 GENOVA, INC. 7034 E. COURT OAVISON, MI_48423

146 900110 YOR HEREPYT TRUBHAUF CORP. LIQUID AND BULK TAHK DIVISION P.O. HOX 660 TORY MAINE, IN 40001

149 403116 Hounes and Impress 807 East Ellsworth P.O. Box 370 153 900116
ITT AEROSPACE/OPTICAL DIVISION
DIVISION OF ITT COMP.
P.O. BOX 3700
FORT WAYNE, IN_86801-3701

INCO, INC. P.O. BOX 444 MUNTINGTON,IN_46750

154

156 900116
INDIANA DIE MOLDING
DIVISION OF NARWET INDUSTRIES INC
9100 PRONT STREET
PORT NATUE, IN_46818-2209

157 900116
INDUSTRIAL PUEL OILS, INC.
1702 S. PAIRFIELD AVENUE
FORT WAYNE, IN_46804

900116

159 900116
JAMESON CORP. OF INDIANA
209 W. OHIO STRBET
P.O. 801 247
RENDALLVILLE, IN 46755-2015

160 900116
JIH KELLY BUICK, INC.
1819 S. CALHOUM
PORT WAYNE, IW_45804

162 900116
JDSAN HANUFACTURING COMPANY
1508 EAST SECOND STREET
HICHIGAN, IN_46360

163 900116
JOT HANUPACTURING COMPANY
301 GRANT STREET
PITTSBURGH, PA_15219

165 900116
KREAGER BROTHERS EXCAVATING
RURAL ROUTE 1
CROHWELL, TW_46732

166 900116 KOONTZ EQUIPMENT 6946 LILAC ROAD PLYMOUTH, IN_46563

168 900116
RERR GLASS MANUPACTURING CORP.
524 EAST CENTER
DUNKIRK,IN_47336

169 900116
LARDEN CORP.
RENEE R. HANNIUNET
11 S. HERIDIAN ST. SUITE 1313
BARNES AND THORNBURG
INDIANAPOLIS, IN_46204

.171 900116 (RA) GENE LOPSHIRE 401 M. FAIRFAX FORT WAYNE, IN 46807 172 900116
LINE CITY MFG. CO., INC.
1470 ETMA AVENUE
P.O. BOE 509
HUMTINGTON, IM. 46750-3640

174 900116 LINCOLN HANDFACTURING COMPANT INC P.O. BOX 1229 FORT WAYNE, IN 46801 175 900116 LOBDELL-EMERT MFG. CO. 10850 17th Street Argos, In 46501-9703

177 900116 LTDELL, INC., ELASTOMER PRODUCTS GROUP Page 1001 27 Greener Caret 178 200116 2ANXX, 1NC. 100 PROGRESS WAY W AVILLA, IN 46713 152 900116
THOMAS L. ALDRICH
ASSISTANT GENERAL COUNSEL
2700 SANDERS ROAD
HOUSELD HOUSELURING, EYE.
PROSPECT HEIGHTS, LL_60070

155 900116 INDIANA ATR NATIONAL GUARD BARR PIELD PORT WAYNE, IN 40609

158 900116
INTERNATIONAL HARVESTER COMPANY
2701 COLISEUM BOULEVARD
P.O. 90X 596
FORT WAYNE, IN 46801

161 200116
JOHNSON PRODUCTS
2100 STERLING AVENUE
ELKHART, IN 46516

164 900116

K. MART DISTRIBUTION SENTER
P.D. BOX 359
FORT WAYNE, IN 46801

157 900116 RITTHEN OBTP, ENG. MILLIAN L. SWEET, JH. P.O. BOX 2263 BARRETT, BARRETT 5 MONAGRY FORT WATNE, IN 46801

170 900116
RUPUS H. TRAIG, DIRE, DIRE OF THE HACHILLAN BLOEDAL, INC.
P.O. BOX 366
PINE HILL, AL 36769

173 403116 LIMBSTONG RADDUCTS, INC. 8-0. BOX 618 PORTLAND, IN 11777

176 90313.
LOCK SSTAT CONCUSTORISE. ON COMMON REPRESENT OUTER
10.0. LOCK STATE
STORTH BASE IN STREET

GERBER STREET LIGONIER, IN_46767-0491

900116 THOMAS H. NAPHER, ESQ. HAGNAVOR CONSUSHER ELECTRIC CO. P.O. BOX 14810 NORTH AMERICAN PHILIPS COMPANY KNOXVILLE, TH_37914

900116 103 MARTIN OIL 4501 127TH ALSIP BLUE ISLAND, IL_60406

186 900116 NCCORD BEAT TRANSFER CORP. 500 W. HARRISON STREET PLYMOUTH, IM_46563-1324

900116 189 HEARS SERVICE, INC. (RA) CT CORP-1 W. CAPITAL AVENUE INDIANAPOLIS, IM_46240

192 900116 MISHAWARA CITY SCHOOLS 1402 S. HATH MISHAWAKA, IN_46544

900116 MIERS SEPTIC SERVICE ROUTE 3 EFGONIER, IN 46767

900116 198 NATIONAL HEAT TREATING CORP. 1621 S. HONROE TORT SETENT, TH. BEROT

300116 201 RIPSCO 5265 HOHMAN AVENUE HAMMOND, IN_46320

181 900116 D.T. CARLTON MAGNAVOR GOV. 6 INDUSTRIAL 1313 PRODUCTION ROAD ELECTRONICS COMPANY FORT WAYNE, IN_46808

184 900116 STEPHEN T. BENIS ASSISTANT CORPORATE COUNSEL 21001 VAN BORN ROAD MASOD INDUSTRIES. INC. TAYLOR, HI_48180

187 900116 ACDONALL ENTERPRISES, INC. JAMES W. WOODSNALL, ESQ. 121 W. PRANKLIN STREET, STE 400 WARRICK, WEAVER, & BOYN ELEMART, IN_46516

190 900116 HERR MACK, INC. 6529 MAPLEDOURS DRIVE PORT WATUR, IU_46815

193 900116 BOBSANTO 910 GERBER STREET LIGONIER, IN_46767

196 900116 WAAS FOOD RURAL ROUTE 5 PORTLAND, YM 47371

199 900116 MORPOLE 6 WESTERN RAILYWAY CO. 8111 MELSON ROAD FORT WAYNE, FR 46803

900116 WORTHERN INDIANA PUBLIC SAVS TO 5265 HOLHMAN AVENUE HAMMOND, IN_46329

205 900116 SOUTH BEND, IN 46624

1/9 900116 ZOLLWER CORPORATION HILES I. GERBERDING P.O. BOK 2263 BARRETT, BARRETT & MCHAGNY PORT WAYNE, IN_46801

132 900116 MAPLEWOOD SHELL SERVICE 6132 STELLHORN ROAD FORT WATER, IN 46815

135 200115 MATERIALS HANDLING EQUIPMENT CORP 7433 US HIGHWAY 30 E. PORT WATHE, IN_46803

900116 W. A. AILES VICE PRESIDENT-TREASURER 909 N. LAPATETTE STREET HOGILL HANDPACTURING CO. THO. VALPARAISO, IN_46383

191 900115 METALLURGICAL PROCESSING, INC. 3715 E. WASHINGTON BOULEVARD P.O. ADE LOBAZ FORT MAYNE, IN 46854 - 3842

194 900116 MODRE BUSINESS PORMS WEST ALLL ANGOLA, YW_46703

900116 R.M. RIVETNA, MANAGER PRINCIPAL ENGENEPRENT 8101 MEST HIGGINS HOAD NATIONAL CAN CORP. CHICAGO, IN 60631

933116 211 NORTH AMERICAN VARIATE IN THE 7001 0.7. HIGHWAY 17 -. FORT WAYNE, IN GRASS

PRARIL REDGESTION-ROTRO

234 1011 D.F. C. Brook At at Ontario Fage Colporation
1200 WEST JACKSON STREET
P.O. BOX 2757
HUNCIE, IN_47303

207 900116 PHD CO. 4763 N. U.S. 24 E. HUNTINGTON, IN_46750-9617

210 900116
POORMAN'S HEATING AND AIR
CONDITIONAING SERVICE, INC.
1417 MARTIN
FORTY WAYNE, IM_46802

213 900116
R.J. RIHA, SUPERVISOR
ENVIRONMENTAL APPAIRS
P.O. BOX 1346
PANHANDLE EASTERN PIPELINE CO.
KANSAS CITY, NO_64141

216 900116
HONICA H. PONRHAW, SR. ATTORNEY
R.R. DONNELLEY & SONS
2223 HARTIN LUTHER KING DRIVE
CHICAGO,IL_60616

219 900116 RENCO OIL P.O. BOX 610 RISHAWAKA, TR_46544

222 900116 ROPPE RUBBER CORP: 101 INDUSTRIAL DRIVE ANGOLA, IN_46703-1045

225 900116 SEANCO 503 E. BROAD SOUTH WHITLEY, IN_46787

228 900116 SHELL CAR WASH 1001 W. 7TH AUBURN, IN_46706 Orton- McCullongh Crane P.O. BOX 846 MISHAWARA, IN_46544

20A 900116
DAIME W. SKINNER
ASSISTANT RISK HAMAGER
P.O. BOX 943
PHILLIPS INDUSTRIES, INC.
DAYTON, OH_45401

211 900116
POWER PLANT SERVICE, INC.
2010 LAKEVIEW ROAD
PORT WAYNE, IW_46808-3922

214 900116
ROWALD R. RICHEY
PRECISION PLASTICS, INC.
P.O. BOX 329
COLUMBIA CITY, IN_46725

217 900116 RACO, INC. HARVEY HUSSELL, INC. P.O. BOX 4002 HISHAWAKA, IN_46755

220 900116 REBSBERGER OIL 1604 RUPEL SOUTH REBOLIE 45678

223 900116 RYDER TRUCK RENTAL FORT WAYNE LEASING P.O. BOX 419 FORT WAYNE, IN 46801

226 900116 SHAMBAN 5 CO., INC 2531 BRENER DRIVE PORT WAYNE, IN_46803

229 900116 SMELLER GLOBE P.O. BOX 962 TOLEDO,OH_43697 O.E.C. Medical Systems
501 ARBONNE ROAD
WARSAN, IN_46580

236 FUDILITY PARTER COMPANY, ENC. STATE ROAD ONE SPENCERVILLE, IN 146.788

209 900116
PLYNOUTH COMMUNITY SCHOO^{11S}
701 BERKELEY STREET
PLYNOUTH, IN_46563

212 900116
PRAIRIE VIEW LANDFILL
P.O. BOX 128
WYATT, IN 46595

215 900116 PRINCO, INC. P.O. BOI 9782 FORT WATHE, IN 45899

218 900116 RECLAIMER, IN... P.O. BOX 619 RISHAWAKA.IN 46755

221 900110
ROJEMPLL INTERNATIONAT
1001 W. CULVER ROAD
KNOT, TN_46534

224 000116
RYDER TRUCK RENTAL
DYSTRICT DEFECT
5225 NEW HAVEN AVENUE
PORT WAYNE, IN_46803

227 73011-SHANE S HEAFT HARRESH PLOU 93X 125 PLOU 93X 125 SWATZEE, IN_46335 231 900116 SHOAFF PARK BAPTIST CHURCH 6651 ST. JOE ROAD FORT WATHE, IM_46815

234 900116
SIBLET MACHINE & POUNDRY CORP.
206 EAST TUTT STREET
P.O. BOX 40
SOUTH BRND, IN_46624

237 900116 STANADYNE, INC. SIDNEY HARGOUS, ESQ. 1 PIRST WATIOWAL PLANA, STE. 5000 WINSTON AND STRAWN CHICAGO,IL_60603

240 900116 STOUTCO, INC. 1 STOUTCO DRIVE P.O. BOX 307 BRISTOL, IN_46507-0307

243 900116 SUPERIOR CO., INC. 16'0 CALHOUN STREET FORT WAYNE, IN_46000-2408

246 900116 SUPREME CORP. 16500 COUNTY ROAD 26 P.O. BOY 463 GOSHEN, IN_46526-9354

249 900116 TTP, INC. ROUTE 8 P.O. BOX 317 VRRSAW, IW 46880

252 900116 u.S. ATEX CO. P.D. BOX 340 1800 TERMINAL ROAD MILES, AI_49120

255 900116
UNITED STATES POST OPPICE
424 SOUTH MICHIGAN
SOUTH BEND, IN_46601

232 900116 STRPPRN'S JOHN DEERE SALES 6 SERVICE P.O. BOX 294 BLUPPTON, IN_46714

235 900116 SIMBRHAN CONSTRUCTION 5720 HUGURNERD ROAD FORT WATHE, IN_46618

236 900116 STRPPEN WILLIAM & SON IMPLEMENTATION SHOP 687 No. MAIN BLUPPTON, IN_46714

241 900116 STRANSS, INC. 22 R. MAIS STREET WORTH WANCHESTER, IN M6060

249 900116 SUPPRIOR LINEAGE 2110 SUNNIT URU MATUN, IU_46769

247 900116
RESSELL N. SUSAG, PHD., P.E.
DIR, EMVIRONMENTAL REGULATORY
P.O. DOX 39391
APPAIRS
ST. PAUL, NU_55133

250 900116
VIC TRIPPEL PLUMBING, MEATING, AIR COMPITIONING, INC.
505 0; 3 MISMAVARA
MISMAWARA, IN_46545

253 900116
UNINOTAL PLASTICS CO. /**
312 W. HILL STREET
P.O. BOX 2000
HISHAWARA, IN_46544-1320

256 900116
UNITERSAL TOOL & STAMPING CO.
GRANT VAN HORNE
P.O. BOX 523
AUBURN.IN 46706

230 PICOUP CATE OF THE CONTROL OF TH

233 900116 SMALL PARTS, INC. P.O. BOX 23 LOGAUSPORT, IN_46947

236 900116 SOUTH BEND LATHE 400 W. SAMPLE STREET SOUTH BEND, IN_46625

239 900116 SUPERIOR WASTE SYSTEMS C/O ROGER ZEHNIER 3003 BUTTERPIELD ROAD MASTE HANAGENENT, INC. OAK BROOK,IL_60521

242 900116 SUN DIL COMPANY P.D. BOX 30 HUNTINGTON,IN_46750

245 900116 SUPERIOR WASTE SYSTEMS \$4107 BUTTERNUT ROAD SOUTH BEND, IN 46629

248 900116 STUDICATE SALES. 1# 801 W. MORGAN KOKONO, IN_46901-2055

251 900116 154 + - ########## 2501 LWW MYSNAWAKA, IN 46544

254 JOHIES STREET STREET STREET STREET STREET BAST CHICAGO, IN_40314

258 900116 VITREOUS STEEL 900 E. WABASH AVENUE WAPPANEE, IN_46550

261 900116
WABASH FIBRE BOX CO.
WESTON PAPER AND HFG. COPERGUSON ROAD, BAER FIELD
PORT WATHE, IN_46609

264 900116 JAN WATERS & ROGERS 7603 NELSO ROAD PORT WAYNE, IM_46803

267 900116
WATHE METAL PROTECTION CO.
1511 WABASH AVENUE
FORT WATHE, IN_46603-2140

270 900116 WOODALL 10261 S. IMPIAN LAKE BOTLETAND INDIANAPOLIS.IN 46236 259 900116 VOLCRAPT COUNTY ROAD 60 ST. JOE, IN_46785

262 900116 WABASH, INC. 411 B. SOUTH HUSTINGTON, IN_

265 900116 JOE WATKINS RUMAL ROUTE 4 PORT WATNE, IN_46819

268 900116
WATHE RECLARATION & RECYCLING INC
LARRY BROCKHAN
P.O. BOX 467
DANIEL DRIVE
COLUMBIA CITY, IN_46725

271 900116
WORLD COLOR PRESS
CREMICAL PLATE CORP.
P.O. BOY 1246
EPPINGMAN, IL_62401

257 900116 VALLET MACHINE PRODUCTS 1840 BORNEMAN AVENUE ELKHART, IN 46517

250 900116
WABASH ALLOYS, INT.
DIVISION OF OGDEN CORP.
P.O. BOX 466
OLD U.S. 24 W.
WABASH, IN_46992-0466

263 900116 WALERKO TOOL 1935 W. LUSHER ELKHART, IN_46517

266 900116
TOTAL SUIPHENT BUT SUIPHENT SCOTT S PETZER BOL SLASGOW AVENUE FORT WERE, IN_46803-1344

269 900116 HIFLEY PRODUCTS 1403 STANLEY DRIVE PLYNOUTH, IN_46561

272 900116 TOLDI CORPORATION 6932 SETTISBURG PIKE PORT WAYNE, IN 46804

ATTACHMENT III

PROPOSED PLAN

WAYNE RECLAMATION AND RECYCLING SITE COLUMBIA CITY, INDIANA

WAYNE RECLAMATION AND RECYCLING PROPOSED PLAN COLUMBIA CITY, INDIANA

INTRODUCTION

This Proposed Plan identifies the preferred option for cleaning up the contamination at the Wayne Reclamation and Recycling (WRR) site. In addition, the Plan includes summaries of other alternatives analyzed for this site. This document is issued by the U.S. Environmental Protection Agency (U.S. EPA), the lead agency for the site activities, and the Indiana Department of Environmental Management (IDEM), the support agency for this response action. U.S. EPA, in consultation with the IDEM, will select a final remedy for the site only after the public comment period has ended and the information submitted during this time has been reviewed and considered.

U.S. EPA is issuing this Proposed Plan as part of its public participation responsibilities under Section 117(a) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). This document summaries information that can be found in greater detail in the Remedial Investigation (RI) and Feasibility Study (FS) reports and other documents contained in the administrative record file for this site. U.S. EPA and the State encourage the public to review these other documents in order to gain a more comprehensive understanding of the site and Superfund activaties that have been conducted there. The administrative record file, which contains the information upon which the selection of the response action will be based, is available at the following locations:

Peabody Library
203 N. Main Street
Colambia City, Indiana 46725

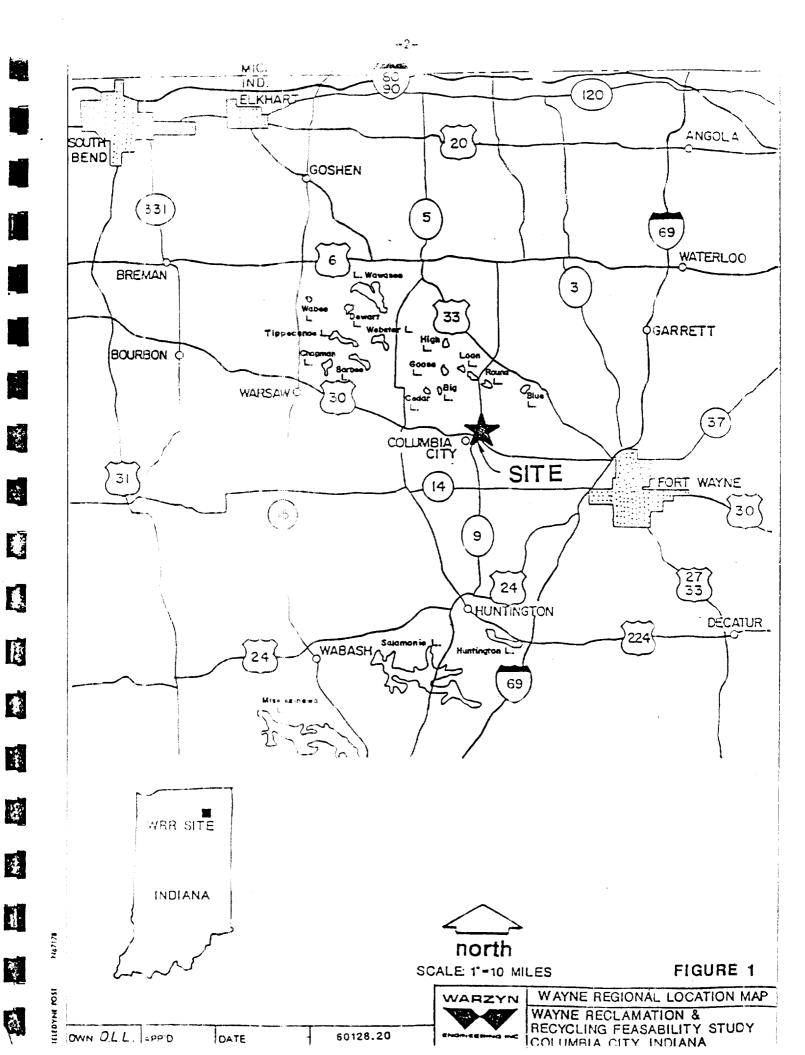
Columbia City Hall 211 S. Chauncey Street Columbia City, Indiana 46725.

U.S EPA, in consultation with the IDEM, may modify the preferred alternative or select another response action presented in the Plan and the RI/FS Reports based on new information or public comments. Therefore, the public is encouraged to review and comment on all the alternatives identified here.

SIT BACKGROUND

Site History

WRR is an approximately 30 acre site, located on the southeast edge of the Columbia City limits (Figure 1). It is bounded on the south and east by the Blue River and on the west and northwest by a cemetery and residential area. The site includes approximately 20 acres currently owned by WRR, 6 acres in the north which WRR sold to Holmes & Company in 1982, and 4 acres on the west owned by Columbia City.



In 1975, WRR purchased approximately 25 acres of land on the southeast edge of Columbia City, including a 13.6 acre portion that Columbia City owned since 1953. WRR and its division, Wayne Waste Oil, began operating an oil reclamation business at the site in 1975. In 1980, the Indiana State Board of Health (ISBH) began investigating the WRR site as a result of reports from a former WRR employee that hazardous wastes were being illegally disposed of at the site. ISBH determined that between February 1979 and May 1980, WRR filed hauler reports stating that it had disposed of 250,000 gallons of sludge at the Williams County landfill in Bryan, Ohio. However, the landfill had not received any waste shipments from WRR during that time.

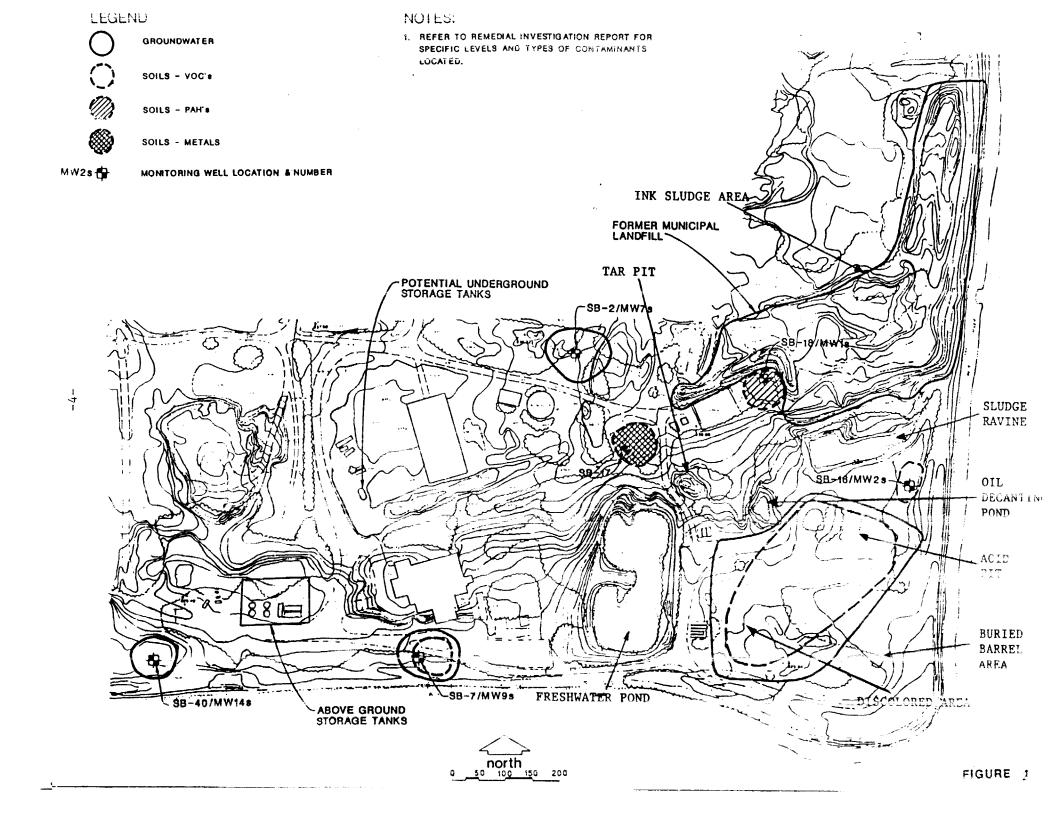
In 1982, WRR and one of its principals, Wayne Brockman, pleaded guilty to illegal "depositing of contaminants" and filing false hauler reports. They were required to pay a fine, to fund a risk assessment of the site, and to pay for cleanup. WRR did not perform the cleanup required under its guilty plea.

The site (Figure 2) can be divided into three major areas—the southeast portion designated as the lower floodplain; the northeast portion designated as an old City landfill area; and the central and west portion, known as the uplands. The lower floodplain includes the areas which have been identified as the "freshwater pond", "oil decanting pit", "tar pit", "sludge ravine", "discolored area", "buried barrel area" and "acid pit". The old City landfull which Columbia City operated from 1953 to 1970, is in the northeast part of the site. Also included in this area is the "ink sludge area". The upland area includes the now inactive WRR office buildings and numerous tanks.

In December, 1982, the WRR site was listed on the National Priorities List (NPL). On July 10, 1986, approximately 100 Potentially Responsible Parties (PRPs) entered into an Administrative Order by Consent with U.S. EPA to conduct a removal action at the site. Because the removal was not satisfactorily completed, a Unilateral Administrative Order was issued to a smaller group of PRPs on February 17, 1988, requiring them to complete a removal action.

On August 14, 1937, U.S. EPA entered into an Administrative Order by Consent with over 100 PRPs to conduct the RI/FS. The U.S. EPA and IDEM oversaw all facets of the investigations. The RI was conducted to determine the nature and extent of contamination and the PS evaluated the alternatives to prevent migration of the contaminants. Results of the RI, which was finalized in June, 1989, are as follows:

o Surface soils in the area of the shooting range (SB-18) are contaminated with polynuclear aromatic hydrocarbons (PAHs).



- The highest levels of volatile organic soil contamination were detected in the southwest area of the site along the Blue River (SB-7/MW9 and SB-40/MW14S); in the northern portion of the site west of the old City Landfill; and the southeast corner of the site. The major contaminants are chlorinated ethenes and to a lesser extent, chlorinated ethanes, toluene and alkanes.
- The majority of groundwater contamination is caused by chlorinated ethanes and occurs in the same general location as the volatile organic soil contamination.
- Magnesium, cadmium, copper, zinc, and lead were detected at levels above the ranges considered to be common in "natural soils." In general, the elevated levels of these compounds coincided with the areas described above for the volatile organic compounds. However, one apparently isolated area of considerably high concentrations of these elements (particularly lead) was detected approximately midway between the "freshwater pond" and the northern boundary of the site (SB-17/SB-17A). In addition, investigations in 1987, by the Technical Assistance Team (TAT) and the Environmental Response Team (ERT) found elevated levels of lead in the contents of four vertical and three horizontal tanks, located just west of the WRR office, and in the surrounding soils.
- concentrations of inorganic parameters in surface water and sediments from the Blue River adjacent to the site were not significantly above those upstream from the site boundary, with the possible exception of copper and zinc in sediments. A slight increase in cyanide concentrations was observed adjacent to the site as compared to upstream concentrations. Concentrations of inorganic parameters (particularly cyanide) in or-site surface waters were elevated in the wetland north of the site, "sludge ravine", and "oil decanting pit." Volatile organic compounds in on-site sediments were elevated in the three surface water locations previously mentioned, as well as in the "freshwater pond."
- Description of the Although this was not discussed in the RI, the old City Landfill lacks appropriate cover to ensure compliance with RCRA Subtitle D regulations.

Scope and Role of the Response Action

The PRPs, under the direction of the U.S. EPA have already initiated two removal response actions at this site. Removal activities under the 1986 Administrative Order by Consent included excavation and disposal of contaminated soil in the "oil decarting pit", "tar pit" and "sludge ravine"; removal and disposal of the contents of 215 55-gallon drums and soil from the

"buried barrel area" and backfill. Backfilling remains to be done in the "oil decanting pit", "tar pit" and "sludge ravine". Removal activities under the 1988 Unilateral Administrative Order included excavation and disposal of contaminated soil from the "discolored area", "acid pit", "ink sludge area" and "sludge ravine"; removal and disposal of an additional 125 drums; removal and disposal of the contents of 23 horizontal tanks; fencing of the "oil decanting pit", "sludge ravine", and "discolored area"; and backfilling the "acid pit" and "ink sludge area" with off-site borrow.

This Proposed Plan addresses contaminated soil and groundwater in the lower floodplain and upland areas of the site; RCRA Subtitle D closure requirements for the old Columbia City landfill; and empty/clean/removal of the remaining tanks and debris which pose a threat to human health and the environment. These areas were determined to be a principal threat at the site because of the potential threat of direct contact with the soils and the soil's impact on the groundwater. The contaminated groundwater is a principal threat at the site because of the potential for direct ingestion of contaminants through municipal and private drinking water wells. This is the third and final response action for this site.

Summary of Site Risks

During the RI, an analysis was conducted to estimate the health or environmental problems that could result if the contamination at the WRR site was not cleaned up. This analysis is commonly referred to as a baseline Endangerment Assessment (Chapter 6 of the RI Report). In conducting this assessment, the focus was on the health effects that could result from direct exposure to the contaminants as a result of the soil coming into contact with the skin, or from darect ingestion of the soil. The Endangerment Assessment also focused on the health effects that could result from ingestion, inhalation, or direct contact with the skin of contaminated groundwater from a municipal or drinking water well.

Groundwater

The major contaminants of concern in the groundwater were Trichloroethylene (TCE) and vinyl chloride. TCE and vinyl chloride are volatile organic compounds that are known to cause cancer in laboratory animals and are therefore classified as cardinogens. TCE is a highly mobile contaminants that typically migrates through the soil into the groundwater.

The average concentrations of TCE and vinyl chloride found in the groundwater beneath the WRR site resulted in an excess lifetime cancer risk of 2 x 10^{-4} . This means that if no cleanup action is taken by U.S. EPA, two additional people per ten thousand have a chance of contracting cancer as a result of the exposure to

groundwater contaminated with TCE and vinyl chloride.

Soil

The major contaminants of concern in the soils were polynuclear aromatic hydrocarbons (PAHs) and Polychlorinated biphenyls (PCBs). PAHs and PCBs are also classified as carcinogens. PAHs tend to be relatively immobile contaminants that will typically remain in the soil for long periods of time.

Sampling of the on-site soil found that average concentrations of PAHs resulted in an excess lifetime cancer risk of 3 x 10^{-2} . This means that if no cleanup action is taken by U.S. EPA, three additional people per one hundred have a chance of contracting cancer as a result of the exposure to the PAH-contaminated soil.

These estimates were developed by taking into account various conservative assumptions about the likelihood of a person being exposed to the soil and groundwater and the toxicity of the contaminants.

Actual or threatened releases of hazardous substances from this site, if not addressed by the preferred alternative or one of the other active measures considered, may present an imminent and substantial endangerment to public health, welfare, or the environment.

SUMMARY OF ALTERNATIVES

Based on the findings in the RI report, the following remedial action objectives were established for the WRR site to ensure protection of human health and the environment:

Groundwater

- o Minimize potential future risk to public health from consumption of contaminated groundwater.
- o Control migration of contaminated groundwater to the Blue River water and sediment.
- o Reduce migrat on of subsurface soil contaminants to the groundwater

Contaminated Soil

- o Minimize risk to public health and environment from the direct contact with PCB and PAH contaminated surface soil.
- o Reduce potential for erosion and transport of contaminated surface and subsurface soil to the Blue River.

Municipal Landfill

Ensure adequate cover is present to prevent erosion and exposure of waste resulting in direct contact or washout to the river.

Surface and Subsurface Tanks and Contents

o Eliminate potential migration of tank contents to surface and subsurface soil and groundwater.

Common Elements

There are seven remedial action alternatives which have been developed to address the contamination at the WRR site. Except for the "No Action" alternative, all of the alternatives now being considered for the site would include a number of common components. Alternatives 2 through 7 include removal and/or treatment of the tank contents and capping of the municipal landfill in accordance with RCRA Subtitle D sanitary landfill closure requirements. Soil and groundwater in the vicinity of the tanks may require additional investigation to delineate the extent of contamination due to spills or leaks associated with the tanks. It is assumed that additional soil or groundwater contamination could be addressed in a similar manner used in other areas of the site.

A large amount of debris is scattered throughout the site. These materials should be evaluated and those determined to be solid waste can be consolidated and placed under the municipal landfill cap. Those materials determined to be contaminated with hazardous waste would need to be cleaned or disposed in accordance with RCRA.

Each alternative also includes groundwater extraction and trearment to health-based levels and MCLs. Long-term groundwater monitoring in compliance with requirements of RCRA Subpart F, 40 CFR section 264.100 will be conducted to gauge the effectiveness of the selected remedy. In addition, erosion control provisions and meed restrictions are required. It should also be noted that the wastes at the WRR site were found to be sufficiently similar to RCRA-listed waste or RCRA-characteristic wastes to make RCRA relevant and appropriate.

Lead-contaminated soil was found in the vicinity of SB-17 and SB-17A. Although this contamination appears to be localized, the extent of remediation of this area will be determined based on additional sampling during the remedial design. Remediation of the lead-contaminated soil will be achieved by either soil washing or immobilization technologies.

A more detailed discussion of the remedial action alternatives is presented below. Costs, including annual operation and maintenance (O&M), for each alternative are also provided. All costs and implementation times are estimated.

Alternative 1: NO ACTION

Capital Cost: \$0
Annual O&M Cost: \$0
Present Worth: \$0
Time to Implement: None

The Superfund program requires that the "no action" alternative be evaluated at every site to establish a baseline for comparison. Under this alternative, U.S. EPA would taken no further action at the site to prevent exposure to the soil and groundwater contamination.

Alternative 2: GROUNDWATER EXTRACTION AND AIR STRIPPING/COVERING PAH-CONTAMINATED SOILS/CAPPING VOC-CONTAMINATED SOILS/EROSION CONTROLS/DEED RESTRICTIONS/MONITORING/CAPPING MUNICIPAL LANDFILL/REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capical Cost: \$3,329,630
Annual O&M Cost: \$ 228,500
Present Worth: \$5,483,700
Time to Implement: 30 years

Given the presence of the municipal well field immediately north of the site, vertical hydraulic gradients are downward from the upper to lower aquifers when the municipal well is being used. Therefore, the groundwater extraction system would be designed to lower the water table approximately 3.5 feet so that groundwater graduents are upward even when the municipal wells are pumping. The extraction wells in the southeast area of the site would be located within a slurry wall in order to allow for lower extraction rates and to facilitate lowering of the groundwater table. Additional groundwater extraction wells would also be placed through the site in order to intercept all contaminated groundwater. Treated groundwater would be discharged to the Blue River. Discharge limits would be established in accordance with IDEM's NPDES program.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. VOC-contaminated soil will be capped in accordance with RCRA Subtitle C closure requirements to prevent the incidence of dermal contact and reduce contaminant migration to the groundwater via infiltration.

In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 3: GROUNDWATER EXTRACTION AND AIR STRIPPING/ SOIL FLUSHING WITH TREATED GROUNDWATER/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$3,248,230
Annual O&M Cost: \$ 236,700
Present Worth: \$5,110,848
Time to Implement: 15 years

The groundwater extraction and treatment system would be identical to the system described for Alternative 2. However, to reduce the time that the system will need to operate, the treated effluent will be flushed through the areas of the site with VOC-contaminated soils. A treatability study will be required to determine the process effectiveness and necessity for adding surfactants to the flushing fluid for aid in contaminant removal. Contaminants are recovered by the groundwater extraction system and treated. The soil flushing has the effect of accelerating the natural process of soil flushing that would occur through rainfall infiltration. It is estimated that the flushing system would operate for a period of 15 years.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 4: GROUNDWATER EXTRACTION AND AIR STRIPPING/ SOIL VAPOR EXTRACTION/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$3,306,875
Annual O&M Cost: \$291,000
Present Worth: \$5,582,499
Time to Implement: \$5 years

To reduce the time required to operate the groundwater extraction and treatment system presented in Alternative 2, a soil vapor extraction (SVE) system would be used to remove the VOC contamination from the soil. The vapor extraction wells would be placed in the areas of the site with VOC-contaminated soils. The area surrounding the vapor extraction wells would be covered with approximately three feet of fill to increase the efficiency of the system by reducing the volume of air being pulled from above the ground surface. The air emissions will be treated to health-based levels. The SVE and groundwater extraction systems will operate in conjunction for approximately 15 years to meet the clean-up criteria.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 5: GROUNDWATER EXTRACTION AND AIR STRIPPING/ EXCAVATION AND BIOLOGICAL TREATMENT OF VOC-CONTAMINATED SOIL/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$7,988,170
Annual O&M Cost: \$279,000
Present Worth: \$9,927,114
Time to Implement: 15 years

To reduce the operating time for the groundwater extraction and treatment system presented in Alternative 2, approximately 30,000 cubic yards of VOC-contaminated soils would be excavated and biologically treated on-site. Microorganisms, nutrients, and oxygen would be supplied to the contaminated soils to promote transformation and aerobic biological degradation of the VOC contaminants. The area available to construct the treatment facility is not large enough to accommodate all of the contaminated soil at one time. Therefore, the excavation, treatment and backfilling operations would need to be staged. It is estimated that soil treatment would take two to four years.

Since this alternative involves the excavation and placement of waste, the RCRA Land Disposal Restrictions (LDR) would be invoked. Therefore, the cost estimate assumes a minimum technology disposal unit would be constructed prior to redisposal of the excavated and treated soil.

The PAH-contaminated soil will be covered to prevent the incodence of dermal contact. In addition, those elements presented in the section entitled "Common Elements" are included in this alternative

Alternative 6: GROUNDWATER EXTRACTION AND AIR STRIPPING/ EXCAVATION AND ON-SITE INCINERATION OF VOC- AND PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Cap:tal Cost: \$ 9,805,845
Annual C&M Cost: \$ 228,500
Present Worth: \$ 1,322,222
Time to Implement: 10 years

To minimize the operating time of the groundwater extraction and treatment system presented in Alternative 2, the VOC- and PAH-

contaminated soils would be excavated and incinerated on-site. Approximately 30,000 cubic yards of contaminated soil would be incinerated on-site using a mobile infrared unit. Based on an average process rate of 14,000 lb/hr, the incineration process would be completed in approximately nine to twelve months. It is estimated that the groundwater extraction system would operate for approximately ten years.

For costing purposes, it is assumed that the incinerator ash would not be a RCRA hazardous waste and could be backfilled onsite. Confirmatory sampling would be required prior to disposal. Waste sludge from the incinerator air scrubbers would, however, be considered hazardous and would thus require disposal at an approved RCRA facility.

In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 7: GROUNDWATER EXTRACTION AND DISCHARGE TO THE POTW/COVERING PAH-CONTAMINATED SOILS/ CAPPING VOC-CONTAMINATED SOILS/EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$1,571,980
Annual O&M Cost: \$ 298,500
Present Worth: \$6,385,960
Time to Implement: 30 years

This alternative is the same as Alternative 2, except that the extracted groundwater would be discharged to the POTW instead of air stripping and discharge to the Blue River. Consideration of this alternative would is based on the assumption that the Columbia City POTW is willing and able to accept the WRR site effluent. Currently the POTW does not have a pretreatment program with IDEM. The Columbia City POTW is scheduled for a capabity expansion in October 1990.

EVALUATION OF ALTERNATIVES

The preferred alternative for cleaning up the WRR site is Alternative 4 -- GROUNDWATER EXTRACTION AND AIR STRIPPING/ SOIL VAPOR EXTRACTION/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS. In addition, additional investigation will be conducted in the now inactive tank area and the lead-contaminated soil area (at SB-17 and SB-17A) to determine the extent of remediation. Based on current information, this alternative would appear to provide the best balance of trade-offs among the alternatives with respect to U.S. EPA's nine evaluation criteria. This section discusses the performance of the preferred alternative

against the nine criteria, noting how it compares to the other options under consideration. A glossary of the evaluation criteria is contained in Table 1.

<u>Analysis</u>

Overall Protection. All of the alternatives, with the exception of the "no action" alternative, would provide adequate protection of human health and the environment by eliminating, reducing, or controlling risk through treatment or engineering controls. The preferred alternative would treat the volatile organic contaminants in the soil and groundwater, cover the PAH-contaminated soil, and cap the municipal landfill to reduce the risks associated with direct contact and ingestion of contaminated soils and/or groundwater.

Because the "no action" alternative is not protective of human health and the environment, it is not considered further in this analysis as an option for this site.

Compliance with ARARs. All alternatives would meet their respective applicable or relevant and appropriate requirements of Federal and State environmental laws. Since the preferred alternative would not involve the excavation and placement of waste, LDR would not be an ARAR. However, all options would involve the relevant and appropriate RCRA requirements.

Discharge of the treated groundwater to the Blue River would meet the State's NPDES discharge limits. No waiver from ARARs is necessary to implement any of the active cleanup options. Soil clean-up levels will be established to ensure that contaminant leaching into the groundwater will not exceed health-based levels or MCLs

Long-term effectiveness and permanence. The preferred alternative would reduce the inherent hazards posed by the VOC-contaminated soil and groundwater through treatment. SVE would be an effective method to reduce contaminant levels in soils because the primary contaminants are VOCs. In addition, the soil cover over the PAH- and VOC-contaminated soils would eliminate the direct contact threat associated with these areas. Removal of the tank contents would eliminate the potential for additional contamination of the surrounding soil and groundwater due to leaks or spills from the tanks.

Alternative a would also be effective in reducing site risks. However, potential complications with soil flushing are the controls required to lower the water table to induce upward gradients from the lower aquifer, while at the same time flush soils above the water table. In addition, the heterogeneous nature of the soils in the southeast area of the site may cause the drainage gallery to backup and discharge to the surface.

TABLE 1

CHOSSARY OF THE NINE CRUTERIA

Community Acceptance will be assessed in the Record of Decision following a review of the public comments received on the RI/FS report

and the Proposed Plan.

Compliance with ARARs

addresses whether or not a remedy will meet all of the applicable or relevant and appropriate requirements of other environmental statutes and/or requires uses of a

waiver.

cost

includes capital and operation and maintenance costs.

Implementability

is the technical and administrative feasibility of a remedy, including the availability of goods and services needed to implement the chosen solution.

Long-term Effectiveness and Permanence refers to the ability of a remedy to maintain reliable protection of human health and the environment over time once cleanup goals have been met.

Overall
Protection of
Human Health and
the Environment

addresses whether or not a remedy provides adequate protection and describes how risks are eliminated, reduced or controlled through treatment, engineering controls, or institutional controls.

Reduction of Toxic:ty, Mobility, and Volume is the anticipated performance of the treatment technologies a remedy may employ.

Short term Effectiveness involves the period of time needed to achieve protection and any adverse impacts on human health and the environment that may be posed during the construction and implementation period until cleanup goals are achieved.

State Accept ance and cates whether, based on its review of the RI/FS, Proposed Plan, and public comments, the State agency concurs, opposes, or has no comment on the preferred alternative.

Alternatives 5 and 6 would effectively reduce site risks through treatment; however, land disposal of the treated material or ash would require long-term O&M.

Alternatives 2 and 7 would eliminate the direct contact threat; however, the inherent hazards of the waste will remain. The municipal landfill cap and groundwater monitoring system will require long-term O&M for all alternatives. Alternatives 5 and 6 are the only alternatives that would actively treat the PAH-contaminated soil, for all other alternatives these soils would be consolidated under the municipal landfill cap.

Reduction of toxicity, mobility, or volume of the contaminants through treatment. Only four of the alternatives would treat the principal threat of VOC-contaminated soil to reduce toxicity, mobility, or volume. The preferred alternative and alternative 3 would involve treatment of the VOC-contaminated soil via SVE or soil flushing in conjunction with groundwater extraction and treatment.

Alternatives 5 and 6 would involve biological treatment or incineration that would permanently destroy the VOC and PAH contaminants. The treated soil or contaminated ash would; however, be disposed of in a RCRA landfill.

Alternatives 2 and 7 achieve no reduction in toxicity, mobility, or volume for the NOC-contaminated soils.

It should be noted that although the cap over the municipal landfill and PAH-contaminated soil does not afford a reduction in toxicity, mobility, or volume, it would significantly reduce infiltration and the production of leachate that could migrate off-site.

Short-term effectiveness. The preferred alternative and Alternative 3 would require approximately 15 years to achieve the groundwater clean-up levels. Although Alternatives 5 and 6 would achieve groundwater clean-up levels quicker, both of these alternatives require excavation which would pose some short-term risks of exposure to VOCs during the excavation process. In addition, rainfall infiltration will be immediate during the construction period. This could increase the migration of contaminants in the groundwater. Groundwater clean-up levels would not be achieved for 30 years for Alternatives 2 and 7.

Implementability. The individual technologies described for each of the alternatives are conventional and well demonstrated. However, there is some concern over the technical feasibility of Alternative 3 given the heterogeneous nature of the soils. Conversely, the preferred alternative, which involves SVE has been found to be feasible for a variety of soil conditions.

No unusual difficulties in the placement of the soil cover and municipal landfill cap are anticipated. However, given the close proximity of the PAH-contaminated soil to the municipal landfill the feasibility of constructing two caps is questionable. It may be more appropriate to just incorporate the PAH-contaminated soil under the municipal landfill cap.

Implementation of Alternative 7 would require the consent of Columbia City for use of its POTW.

Cost. The present-worth cost of the preferred alternative is \$5,582,500. The lowest-cost alternative is Alternative 3 at \$5,110,800. The highest-cost alternative is Alternative 6 at \$11,322,200. Alternatives 2, 5 and 7 have present-worth costs of \$5,483,700, \$9,927,100, and \$6,386,000, respectively.

State acceptance. The State of Indiana Department of Environmental Management supports the preferred alternative.

Community acceptance. Community acceptance of the preferred alternative will be evaluated after the public comment period ends and will be described in the Record of Decision for the site

Summary of the Preferred Alternative

In summary, Alternative 4 would achieve substantial risk reduction through treatment of the principal threat remaining at the site (i.e., the VOC-contaminated soil, groundwater, and tank contents) and by providing safe management of other material that will remain at the site. Given its effectiveness and implementability. Alternative 4 achieves this risk reduction in a comparable or smaller timeframe and cost than the other treatment options. Therefore, the preferred alternative is believed to provide the best balance of trade-offs among alternatives with respect to the evaluation criteria. the information available at this time, U.S. EPA believes the preferred alternative would be protective of human health and the environment, would comply with ARARs, would be cost effective, and would utilize permanent solutions and alternative treatment technologies to the maximum extent practicable. Because it would trea: the VOC-contaminated soil and groundwater, the remedy also would meet the statutory preference for the use of a remedy that invo ves treatment as a principal element.

THE COMMUNITY'S ROLE IN THE SELECTION PROCESS

U.S. EPA solicits input from the community on the cleanup methods proposed for each Superfund response action. U.S. EPA has set a public comment period from January 22, 1990 through February 21, 1990 to encourage public participation in the selection process. The somment period includes a public meeting at which U.S. EPA

and IDEM will present the FS report and the Proposed Plan, answer questions, and receive both oral and written comments.

The public meeting is scheduled for Wednesday, February 7, 1990 at 7:00 p.m. and will be held at:

Council Room, City Hall 112 South Chauncey Columbia City, Indiana

Comments will be summarized and responses provided in the Responsiveness Summary section of the Record of Decision (ROD). The ROD is the document that presents U.S. EPA's final selection for cleanup. The public can send written comments to or obtain further information from:

Tinka G. Hyde
Remedial Project Manager
U.S. EPA - 5HS-11
230 South Dearborn Street
Chicago, Illinois 60604
(312) 886-9296

Toll free (800) 621-8431 between 9:00 a.m. and 4:30 p.m. Central Time

U.S. EPA and IDEM are soliciting public comments about the most acceptable way to clean up the Wayne Reclamation and Recycling site. The Proposed Plan and the RI/FS Reports have been placed in the Information Repositories and Administrative Record for the site. The Administrative Record includes all documents such as work plans, data aralyses, public comments, transcripts and other relevant material used in developing the remedial alternatives for the Wayne Reclamation and Recycling site. These documents are available for public review and copying at the following locations:

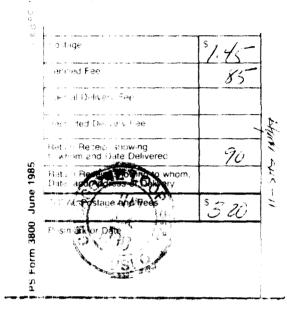
City Hall 112 South Chauncey Columbia City, IN Peabody Library 203 North Main Columbia City, IN.

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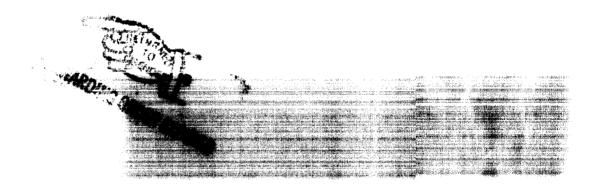


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